

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - -	x	
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UNITED STATES OF AMERICA	:	Affirmation in Support
	:	of Application for
- v. -	:	Order of Continuance
	:	
RENWICK HADDOW,	:	17 Mag. 4939
	:	
Defendant.	:	
	:	
- - - - -	x	
State of New York	)	
County of New York	: ss.:	
Southern District of New York	)	

Martin S. Bell, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Geoffrey S. Berman, United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which an indictment or information would otherwise have to be filed, pursuant to 18 U.S.C. § 3161(h)(7)(A). This is the ninth order of continuance that has been sought.

2. The defendant was charged in a complaint dated June 29, 2017, with violations of Title 18, United States Code, Sections 1343 and 2. The defendant was arrested on April 13, 2018, and was presented on April 13, 2018 before United States Magistrate Judge Robert W. Lehrburger in the Southern District of New York. The defendant was ordered detained. The defendant is represented by

Edward Little, Esq.

3. At the initial presentment, a preliminary hearing was set for May 14, 2018, as to the defendant. Accordingly, the Government had until May 14, 2018, to charge the defendant by indictment or information.

4. On May 14, 2018, Magistrate Judge Barbara C. Moses entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until June 13, 2018.

5. On June 13, 2018, Magistrate Judge Gabriel W. Gorenstein entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until July 13, 2018.

6. On July 13, 2018, Magistrate Judge James L. Cott entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until August 13, 2018.

7. On August 13, 2018, Magistrate Judge Stewart D. Aaron entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until September 12, 2018.

8. On September 12, 2018, Magistrate Judge Kevin Nathaniel

Fox entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until October 12, 2018.

9. On October 12, 2018, Magistrate Judge James L. Cott entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until November 12, 2018.

10. On November 12, 2018, Magistrate Judge Barbara C. Moses entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until December 12, 2018.

11. On December 12, 2018, Magistrate Judge James L. Cott entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until January 11, 2019.

12. On January 11, 2019, Magistrate Judge Katharine H. Parker entered an Order of Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until February 11, 2019.



13. On February 11, 2019, Chief Magistrate Judge Kevin Nathaniel Fox entered an Order of Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until March 13, 2019. On that date, Magistrate Judge Gabriel W. Gorenstein entered an Order of Continuance extended the deadline to April 12, 2019.

13. Mr. Little and counsel for the Government are engaged in discussions concerning a possible disposition of this case, and expect to resolve it shortly. The negotiations have not been completed and we plan to continue our discussions, but do not anticipate a resolution before the deadline under Rule 5.1 expires on April 12, 2019.

14. Therefore, the Government is requesting a 30-day continuance until May 13, 2019, to continue the foregoing discussions and reach a disposition of this matter. Counsel for the Government has communicated with defense counsel and he specifically consented to this request. Laura Grossfield Birger, Chief of the Criminal Division, has approved of this request, which we expect to be the final such request.

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15. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York  
April 12, 2019



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Martin S. Bell  
Assistant United States Attorney  
Southern District of New York  
212-637-2463